

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

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U.S. DISTRICT COURT  
SAN JUAN, P.R.

IN RE:

RIO PIEDRAS EXPLOSION LITIGATION

CONSOLIDATED CIVIL  
ACTIONS NO. 96-2443 (CCC)

**This pleading relates only to  
Action No. 97-2769**

**INFORMATIVE MOTION SUBMITTING  
SETTLEMENT PROPOSAL UNDER SEAL**

TO THE HONORABLE COURT:

The Plaintiffs' Steering Committee in the above captioned case respectfully informs and prays as follows:

1. On August 10, 2004, Magistrate Judge Aida Delgado issued a Conference Report and Order summarizing various issues discussed during the Status Conference held on August 4, 2004.
2. One of the issues specifically addressed during the referenced Conference pertained to the attorneys' fees from the dissolution proceedings of El Fénix de Puerto Rico, Inc., currently under the consideration of the Bankruptcy Court.
3. During the Conference, the undersigned was instructed, in representation of the PSC, and along with attorney Juan Moldes, to streamline a procedure to dispose of this issue.
4. In compliance with this Order, on August 4, 2004, the undersigned conferred with Juan A. Moldes, who proposed a retention of 5.5% in the payment of

PSC fee retention to settle this dispute. The settlement proposal was sent via fax to the members of the Plaintiffs' Steering Committee, whom have accepted the terms of this proposal by way of their respective signatures.

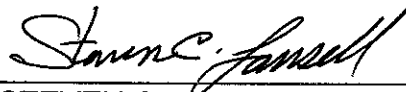
WHEREFORE, it is respectfully requested that the Court accept the Settlement Proposal signed by the members of the Plaintiffs' Steering Committee and note that they have filed the document under seal.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this ~~27<sup>th</sup>~~ day of August, 2004.

I HEREBY CERTIFY: that a true and exact copy of the foregoing Informative Motion has been sent, by regular mail, to: Juan A. Moldes, Esq. , Home Mortgage Plaza, Suite 440, 268 Ponce de León Ave., Hato Rey, PR 00918.

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